

To: FCC Proposed Regulations
From: Mikki Hofferber/Seward County Broadcasting/KAB Board Member
Date: April 2008

This is to reply to the proposed regulations by the FCC to radio stations. I have voiced my concerns to the areas that are most applicable to our stations and reply with a general reconsideration to the implementation of new regulations without further discussion between the FCC and broadcasters.

The first issue is "LOCALISM". Documentation (attached) shows our broadcasting establishment takes every avenue to helping our organizations in promoting their objectives. We provide public service announcements, have members who are active in community programs, broadcast local sports, attend various school functions, have raised thousands of dollars for our community, etc. And, from organizations such as the NAB, who recognize the broadcasting industry with awards for outstanding community service, one can see the hours of dedication all broadcasters invest to helping the local organizations in raising money and awareness to their cause. Any organization to benefit those in need, knows that the local radio stations are always there for support.

The above issue brings focus to the need of establishing an Advisory Board. The broadcasting industry already keeps the local institutions informed of their ability to help their organization. And most persons of today's society already have many meetings/functions to attend. The broadcasters have always been self-promoting as a leader to helping the charitable organizations. The continued self-promotion is really the best advertisement to all agencies and the broadcasting relationships.

Another point to address is that radio stations are to have a manned studio 24 hours per day. Many radio stations will find it difficult to find a capable person who would be willing to work those hours. In this time of technology, radio stations are afforded the opportunities to coordinate with emergency personnel in case of disasters. Broadcasters have and continue to be serious to the responsibility of keeping the residents of the community aware of situations that could result in serious consequence. Rural towns are noted to having closer relationships and better communication links. News tends to be distributed quicker due to this community connection.

The implementation of the main studio rule does not mean a better and more effective communication to the community would be established. Again, broadcasters realize that self-promotion of their industry and accessibility to radio to the public is the best avenue for agencies and organizations to pursue.

We currently use voice tracking within our own studios only. Again, those stations voice tracking outside their area, have ample communication avenues to set up between the station and voice track talent to promote the station's local events and services.

The posting of pre and post filing announcements on the website probably will not have any different affect on the general public who listens to radio or TV. In all the years that I have been in the industry, I have never encountered anyone who wanted to see or challenge the operations of the stations where I was employed and one cannot say for certain that the average person really understands the announcements. In the life of the normal persons, their concerns are that the local radio and TV station provide current news, weather, sports and entertainment of the area.

We ask for serious consideration before rules are adjusted that could have a negative impact to the radio and television industries.